

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE No. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**EIGHTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

<b>Name of Applicant:</b>	Jordan & Ortiz, P.C. (“J&O”)	
<b>Applicant’s Role in Case:</b>	Co-Counsel to Debtor	
<b>Date Order of Appointment Signed:</b>	January 20, 2023 (Dkt #105)	
	<b>Beginning of Period</b>	<b>End of Period</b>
<b>Time Period Covered in Statement:</b>	09/1/2023	09/30/2023
<b>Summary of Total Fees and Expenses Requested</b>		
<b>Total Fees Requested in this Statement:</b>	\$12,688.00 (80% of \$15,860.00)	
<b>Total Reimbursable Expenses Requested in this Statement:</b>	\$16.10 <sup>1</sup>	
<b>Summary Attorney Fees for the Period Covered by this Statement</b>		
<b>Attorneys Fees in this Statement:</b>	\$15,660.00	
<b>Total Actual Attorneys Hours Covered by this Statement:</b>	26.10	
<b>Average Hourly Rate for Attorneys:</b>	\$600.00	
<b>Summary Paraprofessional Fees for the Period Covered by this Statement</b>		
<b>Paraprofessional Fees Requested in this Statement:</b>	\$200.00	
<b>Total Actual Paraprofessional Hours Covered by this Statement:</b>	0.80	
<b>Average Hourly Rate for Paraprofessionals:</b>	\$250.00	

<sup>1</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

### **RELIEF REQUESTED**

1. This is Jordan & Ortiz, P.C.'s ("J&O") eighth monthly fee statement for compensation (the "Fee Statement") for the period of September 1, 2023 through September 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its eighth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$12,688.00 (80% of \$15,860.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$16.10 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

### **SERVICES RENDERED AND DISBURSEMENTS INCURRED**

2. Attached as Exhibit "A" is the Fee Statement for the period September 1, 2023 through September 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

### NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$12,688.00 (80% of fees in the amount of \$15,860.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$16.10 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$12,704.10 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: October 10, 2023

/s/ Shelby A. Jordan  
SHELBY A. JORDAN  
State Bar No. 11016700  
S.D. No. 2195  
ANTONIO ORTIZ  
State Bar No. 24074839  
S.D. No. 1127322  
***Jordan & Ortiz, P.C.***  
500 North Shoreline Blvd., Suite 804  
Corpus Christi, TX 78401  
Telephone: (361) 884-5678  
Facsimile: (361) 888-5555  
Email: [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)  
[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)  
Copy to: [cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)  
**CO-COUNSEL FOR DEBTOR**

### CERTIFICATE OF SERVICE

I certify that on October 10, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

**EXHIBIT “A”**

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD  
SEPTEMBER 1, 2023 through SEPTEMBER 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED  
TO BE PAID UNDER DOCKET #346<sup>2</sup>**

<b><u>Invoice No.</u></b>	<b><u>Month Billed</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fees</u></b>	<b><u>Expenses</u></b>	<b><u>Invoice Total</u></b>	<b><u>Amount Applied</u></b>	<b><u>Remaining Balance Due</u></b>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
<b>TOTAL</b>			<b>\$272,957.50</b>	<b>\$1,303.48</b>	<b>274,260.98</b>	<b>-\$146,790.16</b>	<b>\$127,470.82</b>

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<sup>2</sup> Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023



JORDAN L. CRITZ, P.C.  
 500 N. SHORELINE BLVD, SUITE 804  
 CORPUS CHRISTI, TEXAS 78401-0341  
 TAX ID NO. 74-2553880  
 (361) 884-5678

JONES, ALEX  
 alexejones1777@gmail.com

Page: 1  
 October 04, 2023  
 Account No: 5481-002000M  
 Statement No: 922703

## Bankruptcy

PREVIOUS BALANCE					\$127,470.82	
					Hours	
09/06/2023	SAJ	B190	A107	Email to co-counsel regarding 2004 Examination of Alex Jones on the 12th (next Tuesday) and attendance and call from client.	0.30	180.00
	SAJ	B190	A107	Email to co-counsel regarding lack of objection to dischargeability regarding the original State Court suit alleging actual fraudulent transfers involving client and David Jones.	0.50	300.00
09/08/2023	SAJ	B410	A103	Pull prior form of motion and briefing on issues to report to court (including some original 2022 issues) and work on updating for co-counsel.	1.80	1,080.00
09/10/2023	SAJ	B110	A102	Pull research on indemnity, expense reimbursement, client salary and double reductions and client contributions of \$10M in assets in 2023 and clients \$1M administrative claims.	1.40	840.00
09/11/2023	SAJ	B110	A103	Work on locating final motion to recover trial expenses and disclosing cost sharing responses to Court's inquiry regarding 25% of trial costs.	1.10	660.00
	SAJ	B110	A107	Trip to client office and meeting with co-counsel and work on issues for 2004 exam and for pleading disclosing issues requested by the court since and finish search and additions to 2004 exam issues and expense motion 2022.	2.60	1,560.00
09/12/2023	SAJ	B190	A109	Attend (remotely) 2004 examination of client and work and send real-time information to co-counsel in response to questions and answers.	3.20	1,920.00
	SAJ	B190	A106	Call to co-counsel and client regarding 2004 exam.	0.20	120.00
09/13/2023	SAJ	B190	A109	Attend part of 2004 exam and pull ESG issues from internet and call to client after examination.	1.80	1,080.00
	SAJ	B190	A103	Work on edits to co-counsel response to ROR filing by Committee and support citations to record for arguments.	2.60	1,560.00

JONES, ALEX

October 04, 2023

Account No: 5481-002000M  
Statement No: 922703

Bankruptcy

					Hours	
09/14/2023	SAJ	B190	A103	Work on version 2 and 3 of response to ROR and circulate to co-counsel and conference with client.	2.00	1,200.00
09/15/2023	CRM	B160	A103	Prepare 7th monthly fee statement and email to Shelby Jordan for approval.	0.60	150.00
	SAJ	B110	A104	Review co-counsel editing of ROR response and additional edits sent to co-counsel for approval and filing.	2.60	1,560.00
	SAJ	B320	A106	Conference with client regarding ROR memo, edits and information included in reply.	0.40	240.00
09/18/2023	CRM	B160	A103	File Corrected 6th Monthly Fee Statement and 7th Monthly Fee Statement.	0.20	50.00
09/19/2023	SAJ	B110	A104	Review MOR of both FSS and client and email to co-counsel regarding \$2.5 M retained in FSS with client unable to pay administrative expenses.	0.30	180.00
	SAJ	B120	A106	Conference with client regarding Joey Delano 2004 exam and status.	0.20	120.00
09/20/2023	SAJ	B210	A104	Review MOR from FSS and AEJ regarding salary issues and inability to fund Ch 11 expenses by FSS retention of all its needed funds.	0.40	240.00
09/22/2023	SAJ	B110	A107	Email to co-counsel regarding salary issues and additional articles on draws from FSS by client misquoted by Sandy Hook counsel first day.	0.40	240.00
09/25/2023	SAJ	B110	A107	Call to Battaglia regarding hearing on cash collateral and funds available from FSS to client.	0.20	120.00
09/26/2023	SAJ	B210	A109	Listen to hearing on cash collateral and related agreements to transfer funds to client regarding administrative claims for advances and for past and current salary (1.4 but only bill .5).	0.50	300.00
09/28/2023	SAJ	B190	A104	Review 2004 exam notice of scheduling and call to Steve Lemmon and David Jones counsel and email to co-counsel regarding availability of remote attendance.	0.60	360.00
	SAJ	B190	A106	Call to client regarding David Jones 2004 exam and email to co-counsel regarding David Jones exam.	0.50	300.00
09/29/2023	SAJ	B110	A107	Telephone conference with Battaglia regarding DIP bank account closure and issue of mediation ending and confirmation to be set and Court's ruling on MSJ of Plaintiffs.	0.70	420.00
	SAJ	B110	A107	Call to Norm Pattis and conference call with client on related potential reasons government wants bank access by client removed.	0.60	360.00

JONES, ALEX

October 04, 2023

Account No: 5481-002000M

Statement No: 922703

Bankruptcy

09/30/2023	SAJ	B110	A106	Telephone conference with client memo and call to client regarding Battaglia, Pattis regarding banking issues and potential subpoena and update on status of FSS.	Hours	
					1.20	720.00
				For Current Services Rendered	26.90	15,860.00

Recapitulation						
Timekeeper	Title	Hours	Rate	Total		
SHELBY A. JORDAN	Partners	26.10	\$600.00	\$15,660.00		
CHRYSTAL MADDEN	Paralegals	0.80	250.00	200.00		

09/30/2023	B110	E106	Computer Research - Pacer	16.10
			Total Expenses	16.10
			Total Current Work	15,876.10
			Total Payments	-30,727.29
			Balance Due	<u>\$112,619.63</u>

Task Code Summary

		Fees	Expenses
B110	Case Administration	6660.00	16.10
B120	Asset Analysis and Recovery	120.00	0.00
B160	Fee/Employment Applications	200.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	7020.00	0.00
B100	Administration	14,000.00	16.10
B210	Business Operations	540.00	0.00
B200	Operations	540.00	0.00
B320	Plan and Discosure Statement (including Business Plan)	240.00	0.00
B300	Claims and Plan	240.00	0.00
B410	General Bankruptcy Advice/Opinions	1080.00	0.00
B400	Bankruptcy-Related Advice	1,080.00	0.00

Your trust account #1 balance is

09/19/2023	Opening Balance	\$0.00
	Interim Wire Payment	8,974.35

JONES, ALEX

October 04, 2023

Account No: 5481-002000M  
Statement No: 922703

Bankruptcy

09/21/2023	Payment on 922199	-8,974.35
09/28/2023	Interim Wire Payment	21,752.94
10/03/2023	Payment on 922199, 922213 and 922268	-21,752.94
	Closing Balance	\$0.00

\*The entry N/C signifies time spent for which there will be no charge.\*

**EXHIBIT “B”****TASK CODES**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	11.10	
B120 Asset Analysis and Recovery	0.20	
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		0.80
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	11.70	
B195 Non-Working Travel		
B210 Business Operations	0.90	
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement	0.40	
B410 General Bankruptcy Advice/Opinions	1.80	
B420 Restructurings		
<b>TOTALS:</b>	<b>26.10</b>	<b>.80</b>